

<010>	Study Area Code	522431
<015>	Study Area Name	MASHELL TELECOM INC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Danielle Clausen
<035>	Contact Telephone Number - Number of person identified in data line <030>	3608324130 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	danielle.clausen@rainierconnect.net
<810>	Reporting Carrier	Mashell Telecom, Inc.
<811>	Holding Company	Mashell Inc.
<812>	Operating Company	Mashell Telecom, Inc.

[illegible]

Response Line 510
Mashell Telecom, Inc.
Study Area 522431

Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) MASHELL TELECOM, INC. is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. This document details the processes and procedures that Mashell Telecom, Inc. (the "Company") follows to ensure compliance with service quality standards and consumer protection rules as laid out in FCC Form 481 Instructions.

Mashell Telecom, Inc. provides CPNI training to its new employees and trains existing employees on an annual basis. The Company also conducts subscriber outreach regarding Customer Proprietary Network Information (CPNI) by periodically placing CPNI explanation messages into subscriber's bills. In addition, Mashell Telecom, Inc. trains staff on FTC Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and FTC Red Flag training and understand obligations to adherence of applicable rules.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed.

In addition, employees are periodically briefed on service quality standards and consumer protection issues. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. A recent example is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If complaints are filed with the Company related to service quality standards or consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made. It should be noted that the Company has received very few complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company other than call completion issues, which, as noted above, are not caused by the Company.

Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) MASHELL TELECOM, INC. (ILEC) is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. ILEC trains staff on applicable rules for broadband service issues on an annual basis. In addition, ILEC has placed on its website at www.rainierconnect.net its network practices and policies regarding FCC's Net Neutrality

Rules. ILEC also outlines its rates, terms, and conditions under which ILEC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610
Mashell Telecom, Inc.
Study Area 522431

Functionality in Emergency Situations:

Voice & Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) MASHELL TELECOM, INC. meets the requirements to remain functional in emergency situations and has the following capabilities; back-up power is provided to Mashell Telecom, Inc.'s central office by use of a fixed generator and batteries that provide it with 100 hours of emergency power. We have made arrangements for emergency refueling, and have contingency plans in the event that fuel trucks are unable to reach the central office. In addition, Mashell Telecom, Inc. field electronics have 8 hours of battery back-up power extended by use of fixed or mobile generators. Mashell Telecom, Inc. also has SONET technology deployed in its core fiber optic network that is self-healing and will automatically reroute traffic should a fiber cut occur. Lastly, Mashell Telecom, Inc. is prepared and capable of managing traffic spikes resulting from emergency situations.

Response to Line 1010
Mashell Telecom, Inc.
Study Area 522431

Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Mashell Telecom, Inc. ("Company") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. Company's current total residential local end-user rate¹ of \$18.00 (which includes a local fee of \$18.00, mandated state fees of \$0.00 and mandatory extended area service charges of \$0.00) is not above the standard deviation as specified in the USF/ICC Transformation Order.²

¹ Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

² USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response Line 3010
Mashell Telecom, Inc.
Study Area 522431

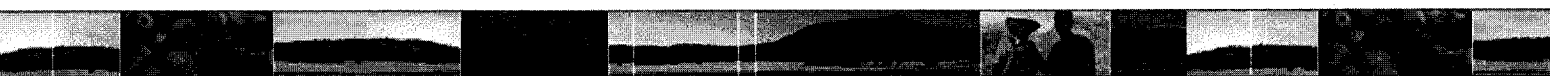
Certification of Public Interest Obligations

Pursuant to 47 C.F.R. § 54.202(a) Mashell Telecom, Inc. ("Company") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time.

Response Line 3010
Mashell Telecom, Inc.
Study Area 522431

Certification of Public Interest Obligations

Pursuant to 47 C.F.R. § 54.202(a) Mashell Telecom, Inc. ("Company") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 15-470, and that requests for such service are met within a reasonable amount of time. Details on how Company is meeting its obligations for broadband goals and required obligations are specified within the FCC Form 481 annual filing.



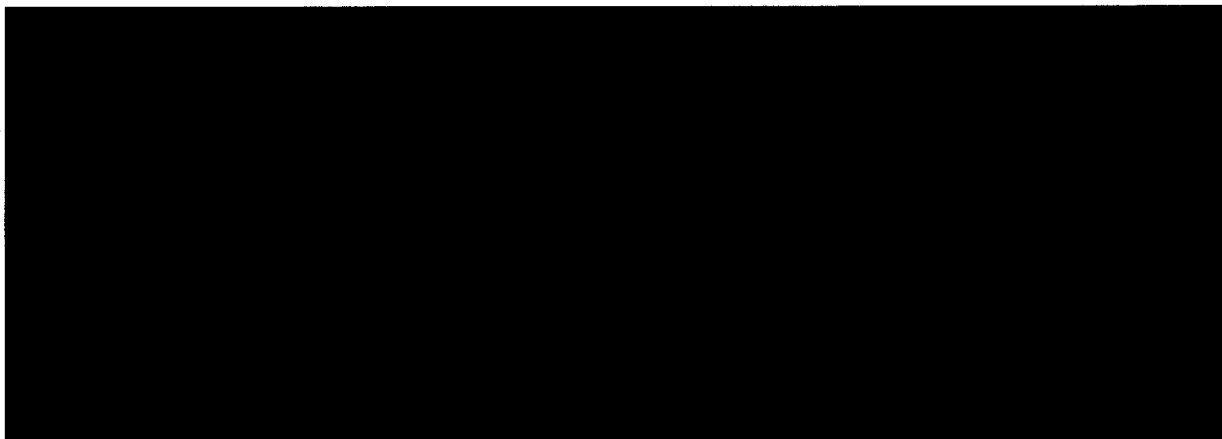
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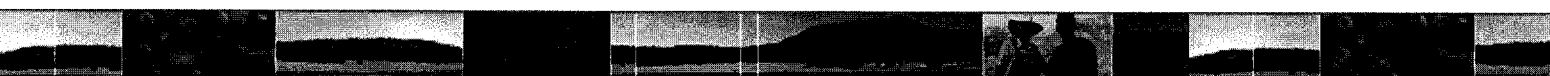
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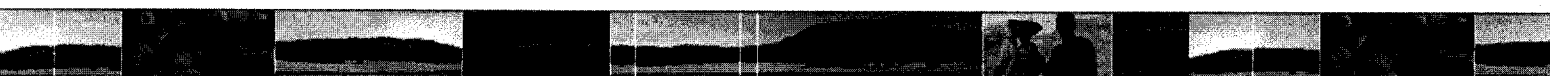
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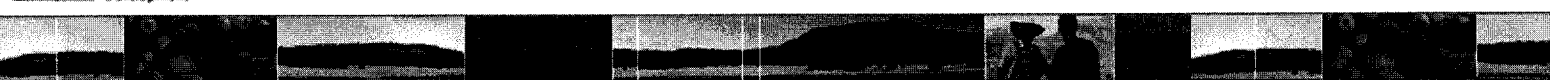
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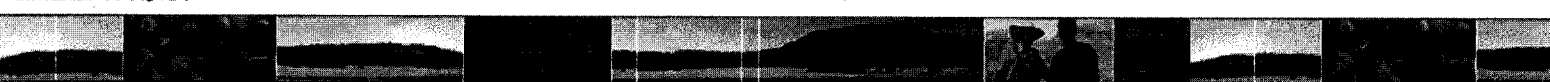
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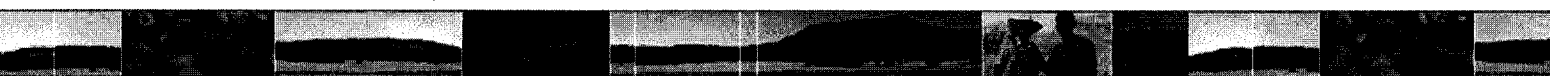
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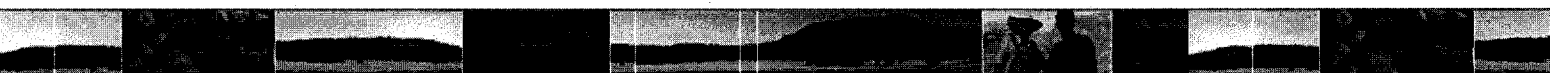
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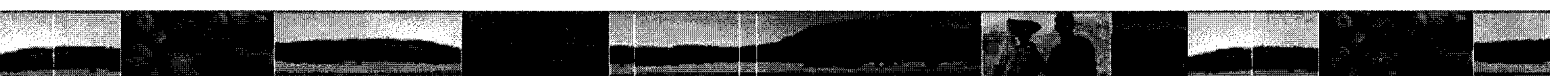
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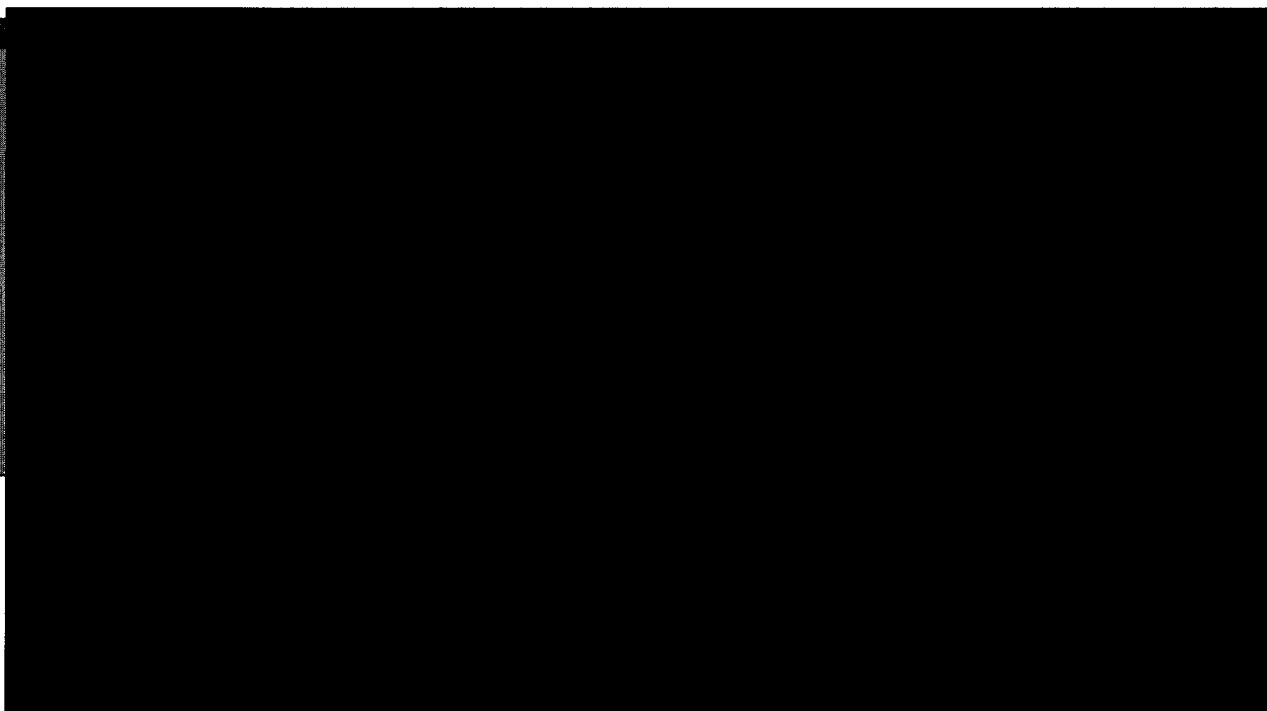
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